

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION, a	)	Case No. 16-cv-1054 (WMW/DTS)
Delaware corporation,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
FEDERAL INSURANCE COMPANY,	)	
an Indiana corporation, and ACE	)	
AMERICAN INSURANCE	)	
COMPANY, a Pennsylvania	)	
corporation,	)	
	)	
Defendants.	)	

**PLAINTIFF FAIR ISAAC CORPORATION’S MOTION FOR SUMMARY  
JUDGMENT ON DEFENDANTS’ STATUTE OF LIMITATIONS DEFENSE**

Pursuant to Federal Rule of Civil Procedure 56 and the Court’s Order dated March 23, 2020 (Dkt. 731), Plaintiff Fair Isaac Corporation (“FICO”) respectfully moves the Court for an Order granting summary judgment that the statute of limitations defense asserted by Defendants Federal Insurance Company and ACE American Insurance Company does not bar any of FICO’s claims. This Motion is supported by an accompanying Memorandum of Law to be filed in compliance with Local Rule 7.1, the Declaration of Heather Kliebenstein and Exhibits attached to the Kliebenstein Declaration, and the papers and records on file herein.

Dated: April 22, 2020

MERCHANT & GOULD P.C.

/s/ Heather Kliebenstein

Allen Hinderaker, MN Bar # 45787

Heather Kliebenstein, MN Bar # 337419

Michael A. Erbele, MN Bar # 393635

Joseph W. Dubis, MN Bar # 398344

MERCHANT & GOULD P.C.

150 South Fifth Street

Suite 2200

Minneapolis, MN 55402

Tel: (612) 332-5300

Fax: (612) 332-9081

ahinderaker@merchantgould.com

hkliebenstein@merchantgould.com

merbele@merchantgould.com

jdubis@merchantgould.com

*Attorneys for Plaintiff Fair Isaac  
Corporation*